DRAFT

EVALUATION REPORT

Quick Stop # 34
2704 South Bascom Avenue
San Jose, CA 95124
GDF#3859
Application #15955

BACKGROUND

Quick Stop #34 submitted this application to increase the throughput limit at G#3859 as part of a site upgrade (site upgrade being handled under A/N 16208). The facility will be installing a Phase II Franklin Healy EVR system with Veeder-Root ISD. When construction is complete, the facility will be equipped with Phase I OPW EVR, Phase II Franklin Healy EVR system with Veeder-Root ISD, 4 triple product gasoline nozzles, and two 12,000 gallon underground gasoline tanks. The baseline for this station is 1.38 million gallons per year established under A/N 30622.

A risk screen performed for this application indicates that an increase of 4.11 million-gallons per year throughput is acceptable under the District's Risk Management Policy and complies with District Regulation 2 Rule 5 Section 302. Accordingly, this facility will now be conditioned to 5.49 million gallons per year pursuant to condition #24100.

This station is within 1,000 feet of Skylar Hadden School triggering the Public Notice requirements of the Waters Bill. There are no other schools within ¼ mile of this station.

Before the throughput increase can be approved, a 30-day public comment period will be held. Notice describing the project and announcing the public comment period will be mailed to the parents of students attending the above school and people living within 1,000 feet of the station. The cost of preparing and distributing this notice will be borne by the applicant.

EMISSION CALCULATIONS

Emission factors are taken from Scott Owen's July 7, 2006 memorandum. Emissions of Precursor Organic Compound (POC) include emissions from loading, breathing, refueling and spillage. The annual gasoline throughput increase of 4.11 million gallons per year is based on the results of the Air Toxics Risk Screening.

Emissions increase:	(4.11 million gal/yr)(0.67 lb/1000 gal)	= 2753.7 lb/yr
		= 7.54 lb/day
		= 1.38 TPY
Benzene emissions increase:	(4.11 million gal/yr) (3.69 lbs Benzene/million gallons)	
		= 15.16 lb/yr
		= 0.04 lb/day
		= 0.008 TPY
Total emissions:	(5.49 million gal/yr)(0.67 lb/1000 gal	= 3678.3 lb/yr
		= 10.08 lb/day
		= 1.84 TPY

NEW SOURCE REVIEW

This station will emit 10.08 # of VOC in a single day(this amount includes the beneze fraction). Thus the BACT requirement of Regulation 2-2-301 is triggered (trigger level is 10 # of VOC per day).

BACT for Gasoline Dispensing Facilities (GDFs) is considered the use of CARB-certified Phase-I and Phase-II vapor recovery equipment. State law prohibits the District from requiring vapor recovery equipment that is not CARB-certified.

Emissions from this station will remain less than 10 tons per year. Per Regulation 2-2-302, offsets are not required.

TBACT

The increased risk from this project exceeds 1 per million, triggering the use of TBACT equipment per Regulation 2-5-301. TBACT for GDFs is considered the use of CARB-certified Phase-I and Phase-II vapor recovery equipment. State law prohibits the District from requiring vapor recovery equipment that is not CARB-certified.

COMPLIANCE

A. **Permits – General Requirements, Regulation 2, Rule 1**

1. **California Environmental Quality ACT (CEQA), Regulation 2-1-311**: This project is considered to be ministerial under Regulation 2-1-311 and therefore is not subject to CEQA review. The engineering review for this project requires only the application of standard permit conditions and standard emission factors in accordance with Permit Handbook Chapter 2.3.and therefore is not discretionary as defined by CEQA.

2. **Public Notice, Schools, Regulation 2-1-412:** The facility is located within 1000 feet of the outer boundary of Skylar Hadden School. It is therefore subject to the public notification requirements of Regulation 2-1-412. A public notice will be sent to all parents of students of the above-mentioned school and all residents within 1000 feet of the facility. There will be a 30-day public comment period.

B. **Permits – New Source Review, Regulation 2, Rule 2**

1. **Best Available Control Technology (BACT), Regulation 2-2-301**: BACT is triggered because the facility will emit more than 10 lbs of VOC per single day. The facility complies with BACT for GDFs.

2. **Offsets, Regulation 2-2-302**: Because the total facility emissions will be less than 10 tons per year, the facility is not required to provide offsets.

C. **Permits – New Source Review of Toxic Air Contaminants, Regulation 2, Rule 5**

1. **Best Available Control Technology for Toxics (TBACT), Regulation 2-5-301:** TBACT is triggered since the increased cancer risk from this project exceeds 1 per million. The facility complies with TBACT for GDFs.

2. **Project Risk Requirement, Regulation 2-5-302**: The increased cancer risk does not exceed 10 in one million, the chronic and acute hazard indexes do not exceed 1, and therefore the project complies with the project risk requirement.

D. **Fees – Regulation 3**

All applicable fees have been paid.

E. **Gasoline Dispensing Facilities, Regulation 8, Rule 7**

The facility shall comply with Regulation 8-7-301 and 302 (Phase I and Phase II) and CARB Executive Orders VR-101H and VR-202C.

RECOMMENDATION

I recommend that an Authority to Construct be issued to Quick Stop #34 reflecting the installation of the Phase II EVR system and the throughput increase to 5.49 million gallons of gasoline per year.

By: _____ Date: 07/31/2007

Duncan Campbell
AQ Permit Technician